

February 25th, 2016

Mr. Wayne Dillard, P.E. Environmental Engineer USEPA Region 7 11201 Renner Boulevard Lenexa, KS 66219

RE:

Response to Comments Annotated on Annual EPA Report - 2015

Order for Compliance on Consent-City of Bolivar

Docket No. CWA-07-2007-0068

Dear Mr. Dillard:

Thank you for your thorough review of our Annual Report. We have prepared point-by-point responses for your consideration.

**EPA COMMENT:** 

"What is the source of the rainfall data listed with the bypasses and SSOs on this spreadsheet. I have downloaded rainfall data from the four separate gauging stations in the Bolivar area (1.0 NE, 1 NE, 2.7 NE and 2.7 E) and have noted agreement with your data in some cases, but also several instances where your reported rainfall is inconsistent with that reported by the gauging stations."

**Bolivar Response**: We believe the source rainfall data for reporting Overflow/Bypass events on Missouri DNR's website to be inaccurate. We are amending our practice to only gather rainfall data solely from the precipitation gauging provided from the National Weather Service located at the Bolivar WWTF.

**EPA COMMENT:** 

"It would greatly assist in reviewing your progress if a sewer system map showing the Location(s) of the work described in this paragraph as completed by City crews, including smoke testing and manhole inspections, were included with the report. The locations of CIPP by contract are shown on the contract documents attached to the report."

**Bolivar Response**: Attached to this report is a map titled; "BolivarSewerInstalledNew, BolivarSewerLined, and BolivarSewerReplaced." This map is an overview of what corrective measures have been taken on our sewer infustructure. This map excludes any 4" lines that have been repaired or replaced. Also, not included on the map is manhole inspections. Crews rate all manholes every time they access a manhole, whether it be jetting, smoke testing, or CCTV.

EPA COMMENT:

"The 'I&I Sources Confirmed' spreadsheet lists corrective actions taken. There is no corresponding listing of defects identified by this smoke testing that are planned for future correction. Have they been corrected and included in the spreadsheet or is there a separate listing of these that is not included with this report?"



Bolivar Response: Attached to this report aerial maps showing the areas that were tested. Highlighted on these maps are the mains that were smoke tested. The following pages are showing which sections were tested, findings and corrective actions taken. We chose these basins due to excessive run times during rain events. An exception was made when testing section "Russel (Flood Zone)". This particular section lies in a lower area with heavy drainage.

EPA COMMENT: "How long do you anticipate completion will require? How long to complete the 14x basin and how long after that for other basins you intend to address?"

**Bolivar Response**: We are wrapping up the basin labeled 14x the flow. We intend to have the entire basin completed (replaced/CIPP) in 2017. We also intend on working on the next high flow basin (10x during wet weather events) in 2017. As usual, we plan on putting approx. \$140,000 towards CIPP in 2017 which should finish up the 14x basin and have some lining go towards 10x. We are going to continue to evaluate our mains with CCTV, smoke testing, and flow meter to try and find the biggest source of I&I into our infrastructure, although our main focus will be on 10x the flow basin.

EPA COMMENT: "The latest revision to the POA had post rehabilitation flow monitoring scheduled in the spring of 2015 to assess the effectiveness of the 2014 CIPP work in addressing the I&I issues. This report does not contain any information regarding the conduct of that activity and the number/frequency of SSOs and bypasses reported during the 2015 suggests measurable progress has not been attained.

**Bolivar Response**: We had equipment malfunction during wet weather events. We are currently awaiting our new flow meter, it should arrive at any time. With the purchase of the new meter, we will be receiving additional training. This will give us two flow meters which will be beneficial for tracking flow and help us be as efficient as possible when rehabilitating our sewer infrastructure. We intend to have information on the 14x basin by May.

EPA COMMENT: "Is there an engineering evaluation available that identifies the estimated frequency and volume of overflows that result from this "bottle neck" and to what extent this project will alleviate the problem?

**Bolivar Response**: Included in this report a document noted as "Downtown Sewer Report". This evaluation serves as the basis for the design of the Downtown Sewer Improvements in which Olsson is finalizing. We had twelve SSOs in the 2015 year that pertain to this bottleneck effect.

Respectfully,

Jerry Hamby

City of Bolivar Public Works Director